

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<p>Tushar Bhatia, individually and as the representative of a class of similarly situated persons, and on behalf of the McKinsey & Company, Inc. (PSRP) Profit-Sharing Retirement Plan and the McKinsey & Company, Inc. (MPPP) Money Purchase Pension Plan,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>McKinsey & Company, Inc., MIO Partners, Inc., and John Does 1-50,</p> <p style="text-align: center;">Defendants.</p>	<p>No. 1:19-cv-1466-GHW-SN</p> <p>PLAINTIFF’S NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT</p>
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PLEASE TAKE NOTICE that Plaintiff Tushar Bhatia (“Plaintiff”) respectfully moves this Court for an Order: (1) preliminarily approving the parties’ Class Action Settlement Agreement; (2) approving the proposed Settlement Notices and authorizing distribution of the Notices; (3) certifying the proposed Settlement Class; (4) scheduling a final approval hearing; and (5) granting such other relief as set forth in the proposed Preliminary Approval Order submitted herewith.

This motion is made pursuant to Federal Rule of Civil Procedure 23(e), and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Kai Richter and exhibits thereto, the Declaration of Tushar Bhatia and exhibit thereto, the parties’ Settlement Agreement, and all files, records, and proceedings in this matter. Defendants do not oppose the motion as parties to the Settlement Agreement.

Dated August 10, 2020

NICHOLS KASTER PLLP

/s/ Kai Richter

Kai H. Richter, MN Bar No. 0296545*

Carl F. Engstrom, MN Bar No. 0396298*

Paul Lukas, MN Bar No. 22084X*

Brandon T. McDonough, MN Bar No. 0393259*

Brock J. Specht, MN Bar. No. 0388343*

Michelle L. Kornblit, NY Bar Code #5314794

* admitted *pro hac vice*

4600 IDS Center, 80 S 8th Street

Minneapolis, MN 55402

Telephone: 612-256-3200

Facsimile: 612-338-4878

mkornblit@nka.com

krichter@nka.com

cengstrom@nka.com

lukas@nka.com

bmcDonough@nka.com

bspecht@nka.com

ATTORNEYS FOR PLAINTIFF